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July 12, 2006

BY ELECTRONIC FILING

The Honorable Joseph J. Farnan, Jr.
United States District Court
District of Delaware
844 King Street
Wilmington, Delaware 19801

Re: *Raza v. Siemens Medical Solutions USA, Inc., et al.*
Civil Action No. 06-132 (JJF)

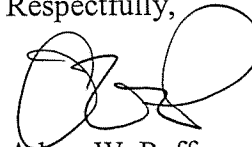
Dear Judge Farnan:

I write on behalf of plaintiff Syed Iqbal Raza, M.D., to inform the Court that Dr. Raza served defendant Siemens AG with process in Germany on June 8, 2006, pursuant to the requirements of the Hague Convention. Proof of service in Germany is attached hereto. Dr. Raza respectfully submits that such service moots Siemens AG's contention in its motion to dismiss (filed on May 2, 2006) that Dr. Raza's claims as to it should be dismissed for failure to comply with the Hague Convention.

Dr. Raza also respectfully requests that the Court schedule a Rule 16 conference in this action at its earliest convenience. This case will proceed against defendants Siemens Medical Solutions, USA, Inc. and Siemens Medical Solutions Health Services Corporation, both of which have answered the Complaint and asserted a counterclaim, regardless of the outcome of Siemens AG's motion to dismiss. No inefficiency therefore will result from the entry of a scheduling order and the inception of discovery at this time.

Should your Honor have any questions about the foregoing, counsel for Dr. Raza are available at the Court's convenience.

Respectfully,



Adam W. Poff
(No. 3990)

YOUNG CONAWAY STARGATT & TAYLOR, LLP

The Honorable Joseph J. Farnan, Jr.

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AWP:kms

Attachment

cc: Clerk of the Court

Larry R. Wood, Jr. (w/ attachment)

EXHIBIT A

APPLICANT IS AUTHORIZED TO SERVE JUDICIAL PROCESS UNDER THE UNITED STATES FEDERAL RULES OF CIVIL PROCEDURE AND UNDER THE RULES OF CIVIL PROCEDURE OF THE STATE OF: Delaware

**REQUEST
FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS**

*DEMANDE
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE*

Convention on the Service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.

Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.

<p style="text-align: center;">Identity and address of the applicant <i>Identité et adresse du requérant</i></p> <p>Josh R. Cobb APS INTERNATIONAL, LTD APS International Plaza 7800 Glenroy Road Minneapolis, Minnesota 55439-3122 U.S.A. Tel. 952.831.7776 Fax: 952.831.8150 Email: JCobb@CivilActionGroup.com</p>	<p style="text-align: center;">Address of receiving authority <i>Adresse de l'autorité destinataire</i></p> <p>PRAESIDENT DES OBERLANDESGERICHTS MUENCHEN Priemayerstrasse 5 80097 Muenchen Bayern Germany</p>
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Der Präsident
des Oberlandesgerichts München

Eing. 18. MAI 2006

.....AktHeftBeil.Abdr.
Nr. 334.1.1.1 - 338/06

The undersigned applicant has the honour to transmit -- in duplicate -- the documents listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,
(identity and address)

Le requérant soussigné a l'honneur de faire parvenir -- en double exemplaire -- à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:

(identité et adresse) Siemens AG

Wittelsbacherplatz 2, D-80333 Munich, Germany

Tel:

- [] (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.*
a) *selon les formes légales (article 5, alinéa premier, lettre a).*
- [X] (b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)*:
b) *selon la forme particulière suivante (article 5, alinéa premier, lettre b): By personally delivering the documents into the hands of any officer, managing agent or any other agent authorized to accept service of process upon the defendant. If you are unable to effect service by this method, please proceed with service in accordance with sub-paragraph (a) above.*
- [] (c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)*.
c) *le cas échéant, par remise simple (article 5, alinéa 2).*

The authority is requested to return or to have returned to the applicant a copy of the documents -- and of the annexes* -- with a certificate as provided on the reverse side.

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte -- et de ses annexes -- avec l'attestation figurant au verso.

List of documents

Énumération des pièces

Amended Complaint
Exhibit "A"
Order Authorizing Special Process Server
Summons in a Civil Case
Complaint
Translations
Summary of the Documents to be Served

Done at _____, the _____
Fait à Minneapolis, Minnesota, U.S.A., le 5/5/06

Signature and/or stamp.
Signature et/ou cachet.



(Formerly OBD-116 which was formerly LAA-116,
both of which may still be used)

USM-94

(Est. 11/22/77)

Case Name: Raza v. Siemens Medical Solutions USA, Inc.
Defendant: Siemens AG
Court Case No.: 06-132 (JJF)

**CERTIFICATE
ATTESTATION**

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention,
L'autorité soussignée a l'honneur d'attester conformément à l'article 6 de ladite Convention,

1) that the document has been served*

1. *que la demande a été exécutée*

- the (date)

08.06.2006

- le (date)

- at (place, street, number)

- à (localité, rue numéro)

Wittelsbacherplatz 2, 80333 München

- in one of the following methods authorised by article 5-

- dans une des formes suivantes prévues à l'article 5:

~~(a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention*:~~

~~(a) selon les formes légales (article 5, alinéa premier, lettre a).~~

~~(b) in accordance with the following particular method*:~~

~~(b) selon la forme particulière suivante:~~

persönlich

(c) by delivery to the addressee, who accepted it voluntarily.*

~~(c) par remise simple~~

The documents referred to in the request have been delivered to:

Les documents mentionnés dans la demande ont été remis à:

- (identity and description of person)

- (identité et qualité de la personne)

Johannes Kallweit und Dr. Werner Paul Schick

- relationship to the addressee (family, business or other):

- liens de parenté, de subordination o autres, avec le destinataire de l'acte:

Prokuristen der Siemens AG

2) that the document has not been served, by reason of the following facts*:

2. *que la demande n'a pas été exécutée, en raison des faits suivants:*

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement.

Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint.

LIST OF DOCUMENTS: Summary of the Documents to be Served, Amended Complaint, Exhibit "A", Order Authorizing Special Process Server, Summons in a Civil Case, Complaint, Translations

Annexes

Annexes

Documents returned:

Pièces renvoyées:

siene Anlage

In appropriate cases, documents establishing the service:

Le cas échéant, les documents justificatifs de l'exécution:

Done at München

Fait à

, the 20.06.2006

Signature and/or stamp.

Signature et/ou cachet.

Steinmeier
Rechtsanwältin

* Delete if inappropriate.
Rayer les mentions inutiles.